

# EXHIBIT A

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7 *Counsel for Indirect Purchaser Plaintiffs*

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9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 **IN RE: CATHODE RAY TUBE (CRT)**  
14 **ANTITRUST LITIGATION**

Case No. 3:07-cv-5944  
MDL No. 1917

15 **CLASS ACTION**

16 This Document Relates to:  
17 All Indirect Purchaser Actions

18 **DECLARATION OF ROBERT J.**  
19 **BONSIGNORE IN SUPPORT OF JOINDER**  
20 **AND REPLY OF OBJECTION TO PROPOSED**  
21 **CLASS ACTION SETTLEMENT AND**  
22 **MOTION FOR ATTORNEYS' FEES**

23 Judge: Honorable Samuel Conti  
24 Courtroom One, 17th Floor

1 I, Robert J. Bonsignore, declare as follows:

2 1. I am an attorney licensed to practice before the courts of New Hampshire and  
3 Massachusetts, as well as federal courts throughout the country. I am a partner in the law firm  
4 BONSIGNORE TRIAL LAWYERS, PLLC and have personal knowledge of the facts stated in  
5 this declaration and, if called as a witness, I could and would testify competently to them. I make  
6 this declaration in support of my firm's Joinder and Reply in Support of Objection to Proposed  
7 Class Action Settlement and Motion for Attorneys' Fees.

8 2. My firm is counsel of record in this case, and represents named plaintiff(s) Gloria  
9 Comeaux, Jeff Speaect, Rosemary Ciccone, Anthony Gianasca, Jeff Craig, and Mina  
10 Ashkannejhad individually and/or as Administrator of the Estate of the Late R. Deryl Edwards, Jr.  
11 The following are true and accurate copies that were kept in the ordinary course of business:

12 3. Attachment 1 – A Gianasca Retention Agreement dated March 20, 2008. Mr. Alioto  
13 asked at the time for me to “do him a favor” and add his name to the retention agreement, which I  
14 did without hesitation.

15 4. Attachment 2 – *Fulton, Mehring & Hauser Co., Inc., et al. v. The Stanley Works, et*  
16 *al.*, Case No. 90-0987-C(5), Memorandum of Points and Authorities in Opposition to the Motion  
17 of Trump, Alioto & Trump for an Order Requiring Meet and Confer of Plaintiffs' Counsel and for  
18 other Relief.

19 5. Attachment 3 – *In Re California Indirect-Purchaser X-Ray Film Antitrust*  
20 *Litigation*, Master File No. 960886, Memorandum of Points and Authorities in Opposition to  
21 Trump, Alioto, Trump & Prescott's Motion for an Accounting and Reallocation of Attorneys Fees.

22 6. Attachment 4 – *Ernest M. Thayer et al, v. Wells Fargo Bank, N.A.*, Case No.  
23 A090429, Case Summary.

24 7. Attachment 5 – *Eric Livingston and Stephen Grosse, et al. v. Toyota Motor Sales*  
25 *USA, Inc., et a.*, Case No. C-94-1377-MHP, *Nancy Wolf v. Toyota Motor Sales USA, Inc., et al.*,  
26 Case No. C-94-1359 MHP and *Shellie Hackworth v. Toyota Motor Sales USA, Inc. et al.*, Case No.  
27 C-94-1960 MHP, Order of Special Master Awarding Attorneys' Fees and Costs.

8. Attachment 6 – Coordination Proceeding Special Title (Rule 1550 (b)), Minute Order, Master File No. 39693, JCCP No. 3261.

9. Attachment 7 (a)-(g) – Pages 21-24, 29-30, 34-35, 37-38, 46-48, 52, 59, 60, 63, 65, and Attachments 4 of the November 3, 2015 Deposition of Massachusetts Putative Class Representative Anthony Giasasca.<sup>1</sup>

10. Attachment 8 – Chain of emails between Bonsignore and Alioto dated March 1, 2012.

11. Attachment 9 Photographs of CRT devices produced by the estate of the Late Deryl Edwards thus far by the Estate of the Late Deryl Edwards evidencing his purchases. The estate has advised me that although much has been thrown out, a dusty warehouse can be searched for more purchases. Although her deposition has not been provided to her, his widow, Mina Ashkannejhad testified at deposition that Mr. Edwards spoke of the CRT case and made related purchases.

12. Attachment 10 (a)-(c) – Email to Lead Counsel Alioto dated November 9, 2015 and photos of a Giasasca TV.

13. Attachment 11 – Email to Lead Counsel Alioto dated December 15, 2015.

14. Attachment 12 – Exhibit 3A and Attachment 4 to the Supplemental Objection (Doc. 4144).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15<sup>th</sup> day of December 15, 2015, in Las Vegas, Nevada.

/s/ Robert J. Bonsignore  
Robert J. Bonsignore, Esq.

<sup>1</sup> The attachments to the Giasasca deposition were incomplete. Bonsignore PLLC still has not received the deposition transcript or attachments for the Putative Missouri class Representative Mina Ashkannejhad individually and/or as Administrator of the Estate of the Late R. Deryl Edwards, Jr. This attachment will be filed separately. As of today, neither the Plaintiff nor the counsel has received the deposition transcripts and/or exhibits. Despite the fact that it has been requested several times and it has been over two months since the deposition was taken.

**CERTIFICATE OF SERVICE**

I, Robert J. Bonsignore, hereby certify that on this 15<sup>th</sup> day of December 2015, I caused the foregoing to be electronically filed with the JAMS Electronic Filing (“JAMS”) System, which will send a notice of electronic filing to all parties registered with the JAMS system in the above-captioned matter. A copy will be forwarded via first class mail, postage prepaid, to those parties not electronically registered.

/s/ Robert J. Bonsignore

Robert J. Bonsignore

# ATTACHMENT 1

ATTORNEY REPRESENTATION AGREEMENT

RE:

**Case Name:** MDL No. 1917 In Re: Cathode Ray Tube (CRT) Antitrust Litigation  
**Case Number:** 3:07-cv-05944-SC  
**Filer:** Indirect Purchaser Plaintiffs

I, Anthony Gianasca, ("CLIENT") retain Mario Alioto of Trump, Alioto, Trump & Prescott, LLP and Robert Bonsignore of BONSIGNORE & BREWER (hereinafter "ATTORNEYS"), to be my attorney in connection with the above-referenced action.

1. ATTORNEYS shall undertake and use their best efforts to obtain certification of the plaintiff class to which I belong and/or to achieve a fair and equitable settlement of this case. Because it is possible that certification of the class may not be granted, I am aware that ATTORNEYS may endeavor and agree to individually represent other members of the class in this litigation.

2. If the action is certified as a class action, I will retain the right, as a class member, under the class action rules, to support, oppose, or comment upon any proposed settlement of all or part of the class action, and to support, oppose, or comment upon any application for compensation made by ATTORNEYS. . ATTORNEYS will advance all costs related to the prosecution of the action at their sole expense (to the extent applicable law and ethics rules allow), and, should the class/client recover the attorneys will be entitled to recover out of pocket expenses together with interest. If the action is certified as a class action, and if a monetary recovery is obtained therein for the plaintiff class, either by settlement or judgment, ATTORNEYS will apply to the court for the entirety of their compensation on a reasonable percentage of recovery basis out of such recovery, and/or by defendants if allowed by statute and case law.


3. If the above action is not certified as a class action, ATTORNEYS agree to continue to represent me on an individual basis. If a monetary recovery is obtained therein for me, either by settlement or judgment, ATTORNEYS will be entitled to compensation for their services in an amount of one-third (33 1/3%) of net settlement proceeds or forty percent (40%) of judgment proceeds.

4. ATTORNEYS' compensation shall not exceed any limits on compensation imposed by law. The contingent percentage of recover set forth in this paragraph is not set by law, but is negotiable between ATTORNEYS and CLIENT prior to signing this agreement.

5. ATTORNEYS shall seek appointment by the Court as class counsel, and agree to undertake the representation of all members of the plaintiff class. ATTORNEYS emphasize class action practice and therefore reserve the right to determine litigation tactics on behalf of all clients, and the class. I understand that if a dispute arises between or among clients of the firm, ATTORNEYS cannot act on behalf of any CLIENT in connection with that dispute. It is also understood that if a difference of opinion arises between me and ATTORNEYS, on a significant issue, ATTORNEYS shall have the right to withdraw as my counsel of record. Likewise, I have the right to discharge ATTORNEYS, as my individual counsel, but I understand that class counsel serves by order of the Court.

6. I understand the effect of joint representation on ATTORNEY-CLIENT confidentiality. ATTORNEY-CLIENT communications are privileged and are protected against disclosure to a third party. Under this agreement, I may be one of multiple Plaintiffs being jointly represented by ATTORNEYS. By entering into this agreement, I waive any right I may have to require that ATTORNEYS disclose to me any confidences ATTORNEYS have obtained from any other Plaintiff in connection with the subject matter of this agreement.

7. ATTORNEYS shall have the right to associate other attorneys at no additional expense to CLIENT.

DATED: 3-20-08   
CLIENT SIGNATURE

10 Joseph st  
MAILING ADDRESS

Medford Ma 02155  
CITY STATE ZIP

\_\_\_\_\_  
HOME TELEPHONE (Include Area Code)

617-429-6600  
WORK TELEPHONE (Include Area Code)

ACCEPTED BY ATTORNEYS:

BONSIGNORE & BREWER/TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP

By: 

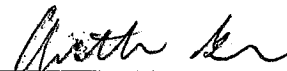


Duties of Class Representatives

1. A class representative represents the interest of all members of the class in litigation to recovery money damages for the class.
2. A class representative has claims which are typical of those of the class, and thus involve common issues of law or of fact. For example, as a class representative, your claims against the defendants are typical of the class claims against them, because each class member incurred damage or injuries as a result of a common event.
3. A class representative always considers the interests of the class just as the class representative would consider his or her own interests.
4. A class representative participates actively in the lawsuit, such as by testifying at deposition and trial, answering written interrogatories, and by keeping generally aware of the status and progress of the lawsuit.
5. A class representative recognizes and accepts that any resolution of the lawsuit, such as by settlement or dismissal, is subject to court approval, and must be in the best interests of the class as a whole.
6. A class representative accepts the possibility that, in the event the case is lost, the court may assess certain defendants' costs of litigation against the class representatives.
7. A class representative is not required to be particularly sophisticated or knowledgeable with respect to the subject of the lawsuit. However, the class representative should be interested, on a continuous basis, in the progress of the lawsuit, and must make every effort to provide class counsel and the court with all relevant facts of which the class representative is aware.
8. A class representative volunteers to represent many other people with similar claims and damages, because the class representative believes that it is important that all benefit from the lawsuit equally, because a class lawsuit will save time, money, and effort, and thus will benefit all parties, and the court, and because the class action is an important tool to assure compliance with the law, applicable standards and duties of care, and to ensure just compensation to all those similarly situated.

I have reviewed and acknowledge my duties as a class representative in the \_\_\_\_\_ proceedings.

Dated: 3-20-08

  
Signature

C:\Client files\Class Actions\CLASSACTIONFEEAGREEMENT.doc

# **ATTACHMENT 7a**

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1 Q. Are you single?

2 A. Of course.

3 Q. What do you do for a living?

4 A. Electrician, contractor.

5 Q. What's your educational background? Did  
6 you finish high school?

7 A. Yes.

8 Q. Any post-high school education?

9 A. Continuing education for electrical and the  
10 trades after high school.

11 Q. And what is your annual salary,  
12 approximately?

13 A. About \$100,000.

14 Q. Between the years of 1995 and 2007, have  
15 you ever purchased a TV with a cathode ray tube in  
16 it?

17 A. Yes.

18 Q. In what states did you make those  
19 purchases?

20 A. Massachusetts.

21 Q. How many CRT TVs do you think you purchased  
22 between that time period?

23 A. I'd have to estimate about four or five?

24 Q. Do you remember where you purchased them?

25 A. Mostly Lechmere Sales over in Cambridge.

1 Q. Do you still have any receipts from any of  
2 those purchases?

3 A. I believe so. I'd have to research it. I  
4 also sent receipts to the lawyer, Alioto, back a  
5 while ago, and I'm not sure if I still have the  
6 originals.

7 Q. Do you remember when you sent those  
8 receipts in?

9 A. Long time ago. It'd have to be around  
10 2008, 2009, possibly, at the beginning.

11 Q. Okay. Between 1995 and 2007, did you  
12 purchase any computer monitors that had a Cathode Ray  
13 Tube?

14 A. I believe so, yes.

15 Q. In what states did you make those  
16 purchases?

17 A. Massachusetts.

18 Q. And how many computer monitors do you think  
19 you purchased during that time period?

20 A. That would be two, roughly.

21 Q. Two?

22 A. Probably a couple.

23 Q. Where did you buy them?

24 A. That, I'm not sure. Primary place would  
25 have been Lechmerc, but I'm not 100 percent sure on

Page 23

1 that one.

2 Q. Do you have any receipts for the purchases  
3 of the computer monitors?

4 A. I don't think they're in my possession  
5 anymore. I think I sent all the receipts -- I  
6 forwarded all the receipts. I have to double check  
7 my files to make sure I didn't miss anything.

8 Q. Did you purchase any products with CRTs in  
9 it besides TVs or computer monitors?

10 A. I may have. I'm not sure exactly.

11 Q. Okay.

12 A. Are you -- specific products --

13 Q. No, I don't have anything specific in mind.  
14 Are you aware of any other products that you have?

15 A. You know what, those two are probably the  
16 main ones.

17 Q. Did you purchase any products, including  
18 TVs or computer monitors, with CRTs in them in any  
19 state other than Massachusetts?

20 A. No.

21 Q. Do you know what a class action is, sir?

22 A. Yes.

23 Q. Do you have an opinion of class actions?

24 MR. BONSIGNORE: Objection.

25 You can answer.

1 A. I guess I have no opinion. I don't have a  
2 legal opinion on that one.

3 Q. Do you have an opinion as a lay person as  
4 to class actions?

5 A. Class actions don't really help the average  
6 person. They help the attorneys. The average person  
7 that fights for consumer rights usually gets shafted  
8 at the end is what my feeling is, my personal feeling  
9 on that.

10 Q. Do you know anything about what notice is  
11 typically provided in class-action settlements?

12 A. A lot of notices do not get provided, and  
13 that's part of the problem here. There's a lot of  
14 unethical behavior with -- by attorneys that are  
15 involved not producing proper documents to affected  
16 people.

17 Q. Do you have anything specific in mind when  
18 you say that?

19 A. Specifically, a lot of people have been  
20 left out of this class action. This is a class  
21 action, I believe, in many ways. A lot of people  
22 have not been notified. There's states that have  
23 been left out, including Massachusetts, and that  
24 seems to be unethical to me.

25 Q. Okay. Do you have an opinion about

# **ATTACHMENT 7b**

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1 front of Judge Hillman in the federal court in  
2 Worcester. So I didn't get a chance to manipulate  
3 that fine copying this morning.

4 BY MR. DEVER:

5 Q. Okay. Mr. Giannasca, do you know if a  
6 complaint was ever filed on your behalf in this case?

7 A. I believe my attorney has filed complaints  
8 on my behalf.

9 Q. Did you authorize him to file those  
10 complaints?

11 A. Yes.

12 Q. Do you remember when he filed those  
13 complaints?

14 A. I think we just went through that. There's  
15 many times --

16 MR. BONSIGNORE: There's other  
17 documents here that we can introduce. That's  
18 probably the one you're looking for.

19 A. Most recently was the (indecipherable)  
20 complaint.

21 (Clarification requested by the court  
22 reporter.)

23 MR. BONSIGNORE: Case 3-08-CV-054 --  
24 sorry. Case 308-CV-01559-SC, Document 1, filed  
25 3/21/08.

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1           It's a 34-page complaint filed by  
2 Mario Alioto, Lauren Russell; Trump, Alioto, Trump &  
3 Prescott; and then Joseph Patane, Law Office of  
4 Joseph Patane. Terry -- Brigid Terry, Anthony  
5 Giannasca, Brigid Flaherty, and Brigid Ten Eyck  
6 against LG and a litany of defendants. And for  
7 whatever -- there's other signatures at the back on  
8 page 33. And my signature -- my name is on page 34.

9           MR. DEVER: Okay. Thank you.

10          BY MR. DEVER:

11          Q. So the document that was just produced is  
12 from 2008. Do you recall having anything to do with  
13 this matter after the initial complaint was filed in  
14 2008?

15          A. Yes.

16          Q. What did you do?

17          A. I contacted my attorney. We talked before  
18 and after, and that's what I -- what do we do, and  
19 went forward with the case.

20          Q. And then did anything else happen in the  
21 case -- did you personally do anything relating to  
22 the case then --

23                 MR. BONSIGNORE: Objection; asked and  
24 answered. He said I sent things --

25          A. Well, I talked to my attorney.

# **ATTACHMENT 7c**

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1 first found out. Do you remember if it was in  
2 September?

3 A. That was before. Might have been -- could  
4 have been July.

5 Q. And how did you find out about the  
6 settlement?

7 A. Contact with my attorney.

8 Q. Did you call him, or did he call you?

9 A. I don't recall. I think we were just  
10 talking and it came up. I don't recall who called  
11 who.

12 Q. Generally speaking, how often do you speak  
13 to Mr. Bonsignore?

14 A. Periodically. Two times a year, I guess.

15 Q. And what caused you to object to the  
16 settlements?

17 A. It was my understanding that my name was  
18 left out of the -- was pulled out of the class action  
19 for no reason. And I was always told that it would  
20 be straightened out, but I realize now that it was  
21 still an issue.

22 Q. Okay. So you're objecting because your  
23 name was taken out?

24 A. I was removed for some unknown reason.

25 Q. Is that the basis for your objection to the

1 settlement?

2 A. I believe so, yes.

3 MR. BONSIGNORE: I'm going to object to  
4 the extent that it calls for a legal analysis.

5 BY MR. DEVER:

6 Q. And what do you hope to achieve as a result  
7 of your objection?

8 A. Fairness for all consumers.

9 Q. Do you know if there was a written  
10 objection made on your behalf to the settlements?

11 A. Yes, I believe so.

12 Q. And do you know what arguments were made in  
13 that objection?

14 A. Is there a specific one, or ...

15 Q. I just want to know what --

16 A. The arguments that basically my name was  
17 removed, and that was the main thing, I believe.

18 Q. Okay. Whose idea was it to file the  
19 objection?

20 A. Mine. My idea.

21 Q. And have you ever received the actual  
22 objection that was filed on your behalf?

23 A. I did look through it, but again, I don't  
24 like to read too many documents. I scan through  
25 them. I don't have time to read every little piece.

# **ATTACHMENT 7d**

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1 there?

2 A. Supplemental? You mean after this one?

3 Q. Yes.

4 A. I'm not sure. I don't remember that. I  
5 just know I objected. How many objections? I'm not  
6 100 percent sure about that.

7 Q. Okay. The objection in your hand,  
8 Exhibit 2 there, did you authorize your attorney to  
9 file that objection?

10 A. Yes. I told him to object, and I believe  
11 this is it.

12 MR. DEVER: Okay. Now I'm going to  
13 mark Exhibit 3.

14 (Exhibit 3, Supplemental Objection to  
15 Proposed class-action settlement and Award of  
16 Attorneys' Fees, marked for identification.)

17 BY MR. DEVER:

18 Q. Exhibit 3, what is that?

19 A. It looks like a -- "supplemental objection"  
20 is what it says.

21 Q. Have you ever seen this before?

22 A. I must have. It's an objection. I thought  
23 it was one and the same, but obviously it's an  
24 additional one.

25 Q. Do you know if you reviewed that

1 supplemental objection before it was filed.

2 A. Yes. It looks familiar, yes.

3 Q. And did you authorize the filing of this  
4 supplemental objection?

5 A. Let me look through it. It looks like it,  
6 yeah. Definitely looks familiar, yes.

7 Q. And what did you hope to achieve by filing  
8 this supplemental objection?

9 A. Well, my name is left out, and it's unfair.  
10 And a lot of other people have been left out, and  
11 it's very unfair to the consumer. And it's awarding  
12 attorneys' fees for doing the -- for not doing their  
13 job. Basically giving an award for bad behavior, as  
14 far as I can see. So I want to achieve fairness, in  
15 answer to your question.

16 Q. Okay. Do you know what arguments are made  
17 in the supplemental objection?

18 A. It's coming down to the same thing. You  
19 know, it's about a consumer rights and the attorneys'  
20 fees, that they're looking for attorneys' fees, and  
21 they left out certain states and a lot of people.  
22 And that's my objection to that.

23 Q. And do you know why the arguments that you  
24 made in the supplemental objection weren't made in  
25 the initial objection?

# **ATTACHMENT 7e**



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1 A. Not that I can recall. And, again, I don't  
2 recall names very well, as you can see.

3 Q. Do you know how much time the attorneys  
4 spent on this case?

5 A. Not specifically, but I would assume it's a  
6 long time. It was many hours.

7 Q. And do you -- have you reviewed any firm's  
8 fee affidavit in this case?

9 A. No, I have not.

10 Q. Do you know what any of the firms' hourly  
11 rates are?

12 A. No, I do not.

13 Q. Are you objecting to the lead counsel's  
14 process of accepting and rejecting certain firms'  
15 time in this case?

16 A. Which counsel?

17 Q. The lead counsel, Trump, Alioto.

18 A. Yes.

19 Q. And why? Why are you objecting to that?

20 MR. BONSIGNORE: Objection; calls for a  
21 legal conclusion.

22 But go ahead.

23 A. Due diligence. They did not do any due  
24 diligence in notifying the proper affected people in  
25 many states, removing names. They -- very unethical

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1 behavior.

2 So, again, getting back to my answer  
3 before, they're awarded for bad behavior. I think  
4 that's wrong. A lot of attorneys do that. And I'm  
5 not -- no insult to you or anybody in this room, but  
6 that's bad practice, which is rampant.

7 Q. So my question is actually a little bit  
8 different. Are you objecting to the way the lead  
9 counsel decides to split any fee that they receive  
10 among the various firms that helped them on the case?

11 MR. BONSIGNORE: Objection; asked and  
12 answered.

13 A. I'm objecting to fairness to all consumers  
14 that were eliminated or not included or notified.  
15 And his fee is in direct relation to bad behavior.

16 Q. Okay. Take a look at Exhibit 2, if you  
17 would, the little objection, the smaller one.

18 A. Okay. What page?

19 Q. If you look at page 3 --

20 A. Okay.

21 Q. -- this is the California paper, so you can  
22 see the eighth line down.

23 A. I can see what.

24 Q. The eighth line down?

25 A. Yes.

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1 Q. Oh, I'm sorry.

2 A. Number eight?

3 Q. Yeah. Where it says, "The nationwide  
4 class."

5 A. I'm sorry. Point it out.

6 Q. I'm sorry. It's page 4 on the top, page 3  
7 on the bottom. Sorry about that. Do you see where  
8 it says, "The nationwide class is improper because it  
9 requires members of the injunctive release settlement  
10 class to release both monetary and  
11 injunctive/equitable claims without any consideration  
12 for such releases?" Do you see that?

13 A. Yes, I see it.

14 Q. Do you understand what that means?

15 A. It sounds like a lot of legal mumbo jumbo,  
16 but I'd have to refer to my attorney to explain it in  
17 better detail.

18 Q. Okay. Is that a no? You don't understand  
19 what it means?

20 A. Well, let me just read it again.

21 All right. It's basically telling me, I  
22 think, that a lot of people are being left out of  
23 this and monetary payment is being considered without  
24 the class of -- the affected class, is what I'm  
25 reading.

# **ATTACHMENT 7f**

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1 not for his TV, if that's what you're worried about.

2 A. Like I said, similar.

3 MR. DEVER: Oh, I'm not worried about  
4 that, but that's what I'm trying to establish.

5 BY MR. DEVER:

6 Q. So this does not have to do with your TV,  
7 then, Exhibit 4?

8 A. No, it's not my TV, no. But it's similar  
9 to what my -- you said does it look familiar.

10 Q. Oh, sorry. Yeah. So you think you have a  
11 receipt that looks like this someplace?

12 A. It's obvious to me that's the back of a TV  
13 with a serial number, and then you've got the front  
14 of the TV. So I am sure I can take pictures of TVs I  
15 have that will be similar to that.

16 Q. Do you still have CRT TVs in your home?

17 A. Yes, I believe I do.

18 Q. Okay. You can put that down now.

19 MR. DEVER: I'm going to mark  
20 Exhibit 5.

21 (Exhibit 5, email from Mr. Alioto to  
22 Mr. Bonsignore dated March 5, 2012, marked for  
23 identification.)

24 BY MR. DEVER:

25 Q. What is Exhibit 5?

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1 complaint. Could you elaborate?

2 A. Well, I was cut out as a consumer, and  
3 everybody else in Massachusetts was left out.

4 Q. So when you were saying the words you were  
5 cut out, you meant --

6 (Multiple parties speaking.

7 Interruption by the court reporter.)

8 BY MR. BONSIGNORE:

9 Q. What did you mean by saying you were cut  
10 out?

11 A. The people in Massachusetts and other  
12 states as well, as I understand.

13 Q. Because you were a class representative?

14 A. Yes.

15 Q. You received, in advance, the first  
16 objection. I think it's Exhibit 1. And I think we  
17 said that there were no changes. Did you have  
18 anything that you wanted to add at the time to  
19 Exhibit 2?

20 A. That's what it says.

21 Q. Okay. Exhibit 2, when we discussed it, did  
22 you have anything that you wanted to add in there  
23 about behavior or anything?

24 A. Well, like I mentioned before, I thought it  
25 was a lot of unethical stuff happening against the

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1 consumer and consumer rights and people not being  
2 notified.

3 Q. But your suggestion was not included in  
4 that?

5 A. Yes.

6 Q. Throughout the years, you've dealt with a  
7 number of the people in my office with regard to the  
8 CRT case?

9 A. Okay.

10 Q. Do you recognize the name Kelly?

11 A. Yes. Kelly sounds familiar, yeah.

12 Q. Do you recognize the name Rick?

13 A. Yes.

14 Q. And Robin?

15 A. Robin is your ex-wife, right, I believe  
16 you're talking about.

17 Q. You've got to bring it up.

18 A. Oh, I'm sorry.

19 Q. I was having a good day. I was just merely  
20 miserable.

21 A. But the answer is yes.

22 Q. And you've had occasion to discuss the case  
23 with them?

24 A. I believe so.

25 MR. BONSIGNORE: That's all that I have

1 A. No.

2 Q. Was she an attorney?

3 A. She might have been.

4 Q. Do you know if she was an attorney?

5 A. I'm not sure.

6 Q. Do you know if she was a paralegal?

7 A. It's possible. It looked like she knew  
8 what she was doing. I don't know.

9 Q. How about Rick? Do you know what his  
10 position was?

11 A. No.

12 Q. And how about Robin? Do you know what her  
13 position was?

14 A. I know she was an attorney.

15 Q. And then in response to Mr. Bonsignore's  
16 questioning, you just said you had some things that  
17 you suggested adding to the initial objection; is  
18 that correct?

19 A. I think I answered that. Adding the part  
20 that -- unethical behavior and the fees being awarded  
21 for not properly doing the correct job as a lawyer  
22 and not informing people. I mean, I think I already  
23 said -- I said all that.

24 MR. BONSIGNORE: Objection; asked and  
25 answered.



Page 65

1 BY MR. BONSIGNORE:

2 Q. When you were taken out of the case, you  
3 testified earlier that you were advised directly or  
4 indirectly that Mario Alioto said not to worry about  
5 it and that he would take care of it. Did you have  
6 any reason to believe that Court appointed lead  
7 counsel would cut you and the State of Massachusetts  
8 out of the economic class?

9 MR. DEVER: Object to the form.

10 A. No. Because I was told not to worry about  
11 it and I just assumed it would be taken care of and  
12 that justice would prevail for all consumers. But I  
13 guess -- I think we're here today because of the  
14 objections and me objecting and obviously raising  
15 these issues.

16 Q. Would you be happy if Mario Alioto, as lead  
17 counsel, acted in the best interest of your behalf  
18 and the other Massachusetts and New Hampshire and  
19 Missouri and other states and put them back into the  
20 economic class?

21 A. I think someone needs to step up to the  
22 plate and do what's right for all consumers, and that  
23 has not happened. And it looks like it's not going  
24 to happen. And there's obviously a class that's not  
25 worth anything. There's a worthless class here

# **ATTACHMENT 7g**



Bonsignore  
Trial Lawyer  
Bonsignore and Brewer  
193 Plummer Hill Road  
Belmont, NH 03220  
(781) 856 7650 (cell)  
Sent from my iPhone

Begin forwarded message:

**From:** Office <deryl@dedwardslaw.com>  
**Date:** March 6, 2012 9:44:26 PM EST  
**To:** Robert Bonsignore <rbonsignore@class-actions.us>  
**Subject:** Fwd: David Perriman TV Purchase History

Sent from my iPhone

Begin forwarded message:

**From:** <office@dedwardslaw.com>  
**Date:** March 6, 2012 6:21:14 PM CST  
**To:** "Karl Dickhaus" <karl@faxlaw.com>, "Office" <deryl@dedwardslaw.com>  
**Subject:** David Perriman TV Purchase History

David Perriman  
27300 Maple Road  
Carl Junction, MO 64834  
Telephone: 417-365-3652

Sarah Goolsby

Secretary for Deryl Edwards, Jr.

606 S. Pearl

Joplin, MO 64801

(417) 624-1962

Fax: (417) 624-1965

[deryl@dedwardslaw.com](mailto:deryl@dedwardslaw.com)



ORDERING PARTS SHOW MODEL NO.

PHILIPS CONSUMER ELECTRONICS COMPANY  
KNOXVILLE, TENNESSEE 37914

25TR15 C122

MODEL NUMBER

16722332

SERIAL NUMBER

PLEASE LISTEN ONE OR MORE OF

- 4 391 376
- 4 121 354
- 4 896 260
- 4 825 364
- 4 521 182
- 4 311 923
- 4 120 583
- 4 942 516
- 4 829 419
- 4 686 522

ASSEMBLED IN  
MEXICO

1.50  
AMPS

60HZ

120V

TX FCC ID:

This device complies with Part 15 of the FCC Rules.  
Operation is subject to the following two conditions:  
(1) This device may not cause harmful interference, and  
(2) this device must accept any interference received,  
including interference that may cause undesired operation.

DATE CODE

MANUFACTURED JANUARY 1999

141902521

CHASSIS

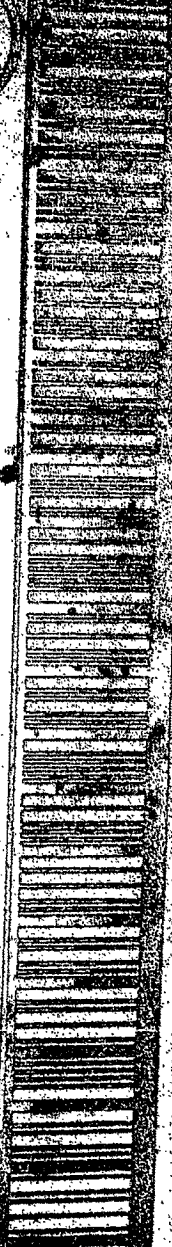
MODEL NO.

25B800-7562

TV RECEIVER

LISTED 347H

E10839





**RISK OF ELECTRIC SHOCK**  
**DO NOT OPEN**

**WARNING: TO REDUCE THE RISK OF FIRE OR ELECTRICAL SHOCK, DO NOT EXPOSE THIS EQUIPMENT TO RAIN, MOISTURE, WATER OR VIBRATIONS.**

**AVERTISSEMENT: RISQUE DE CHOC ELECTRIQUE-NE PAS OUVRIE.**

**PRECAUTION: RIESGO DE CHOQUE ELECTRICO-NO ABRIE.**

**MAGNAVOX**

MODEL MWC13D6  
AC 120V 60Hz 70W



**LISTED**

Manufactured by FUNAI CORPORATION 201 Route 17 North Suite No. 906 Rutherford, NJ 07070

COMPLIES WITH THE FOLLOWING PERFORMANCE STANDARDS: 21000 SUBPART 1  
T820206

**SERIAL No. V48028282 MODEL No. MWC13D6**  
**MANUFACTURED: NOVEMBER 2008 V X7MC**

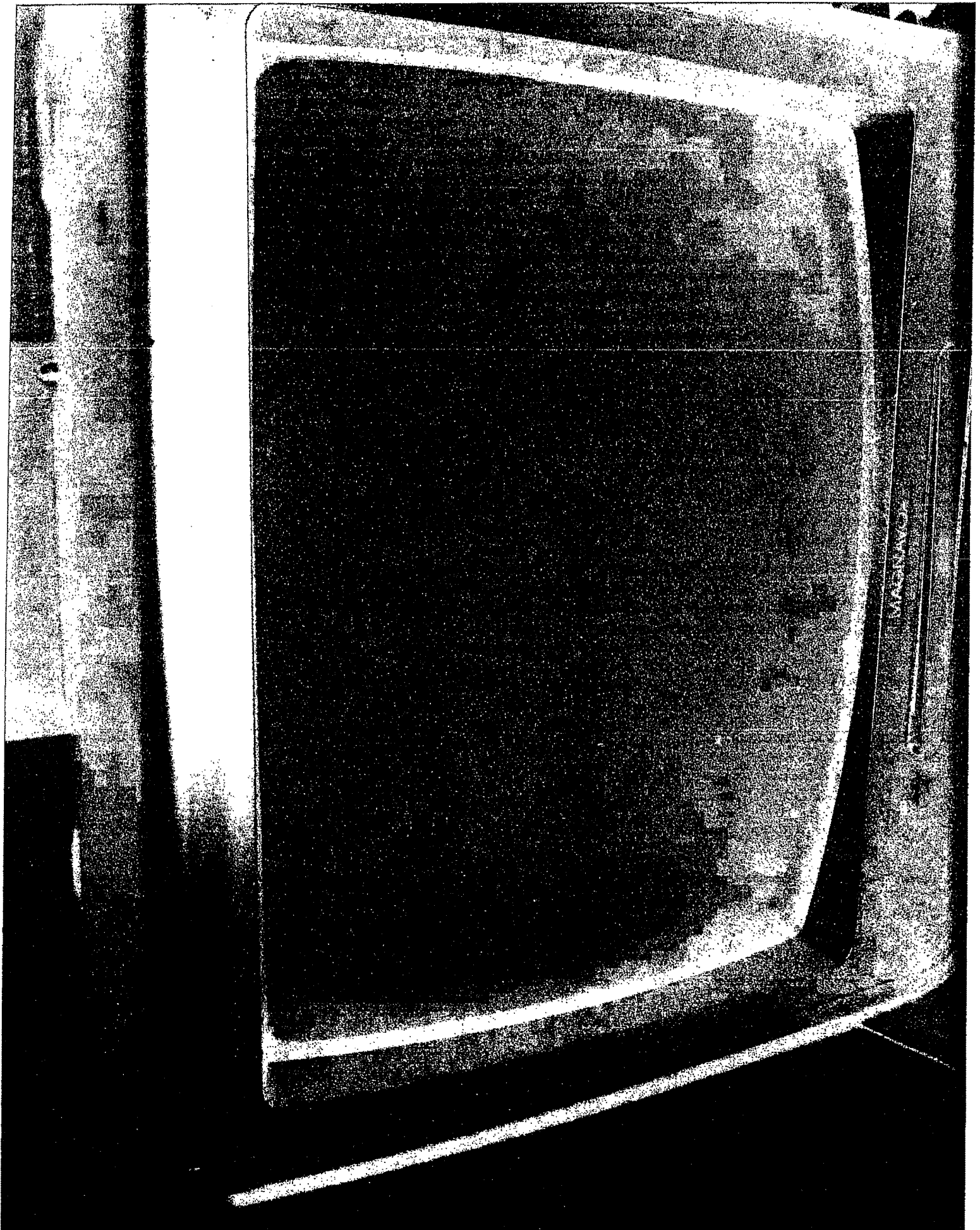
HELP FOR SET-UP

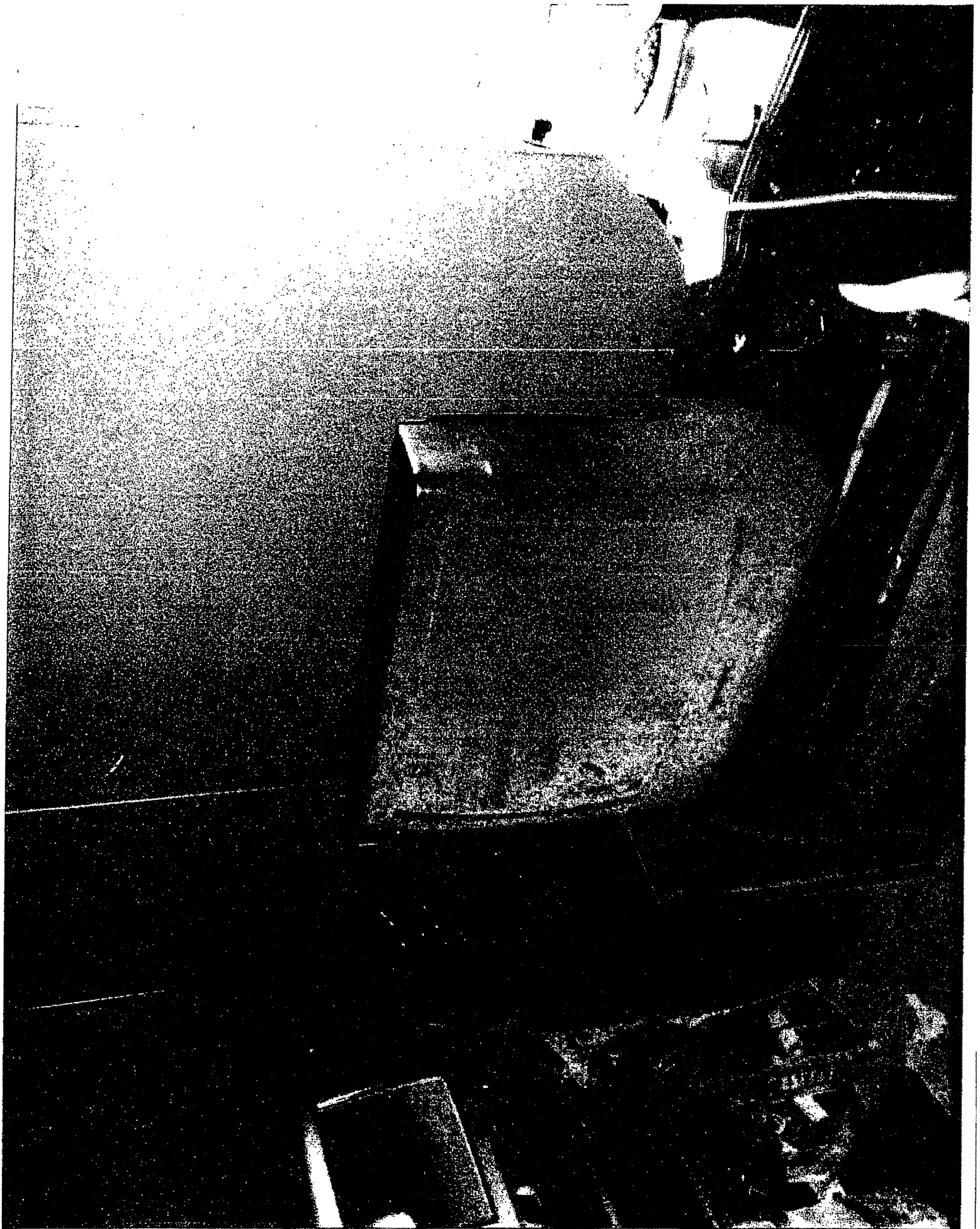
OR OPERATING

**1-800-605-8610**

EJ75216 MADE IN JAPAN









PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

PORTS SHOWN MODEL NO.

ASSEMBLED IN  
MEXICO

1.20

AMPS

60HZ

120V

TX FCC ID:

HI

POT

This device complies with Part 15 of the FCC Rules.  
Operation is subject to the following two conditions:  
(1) This device may not cause harmful interference, and  
(2) this device must accept any interference received,  
including interference that may cause undesired operation.

MANUFACTURED

OCTOBER 1998

1118R191B

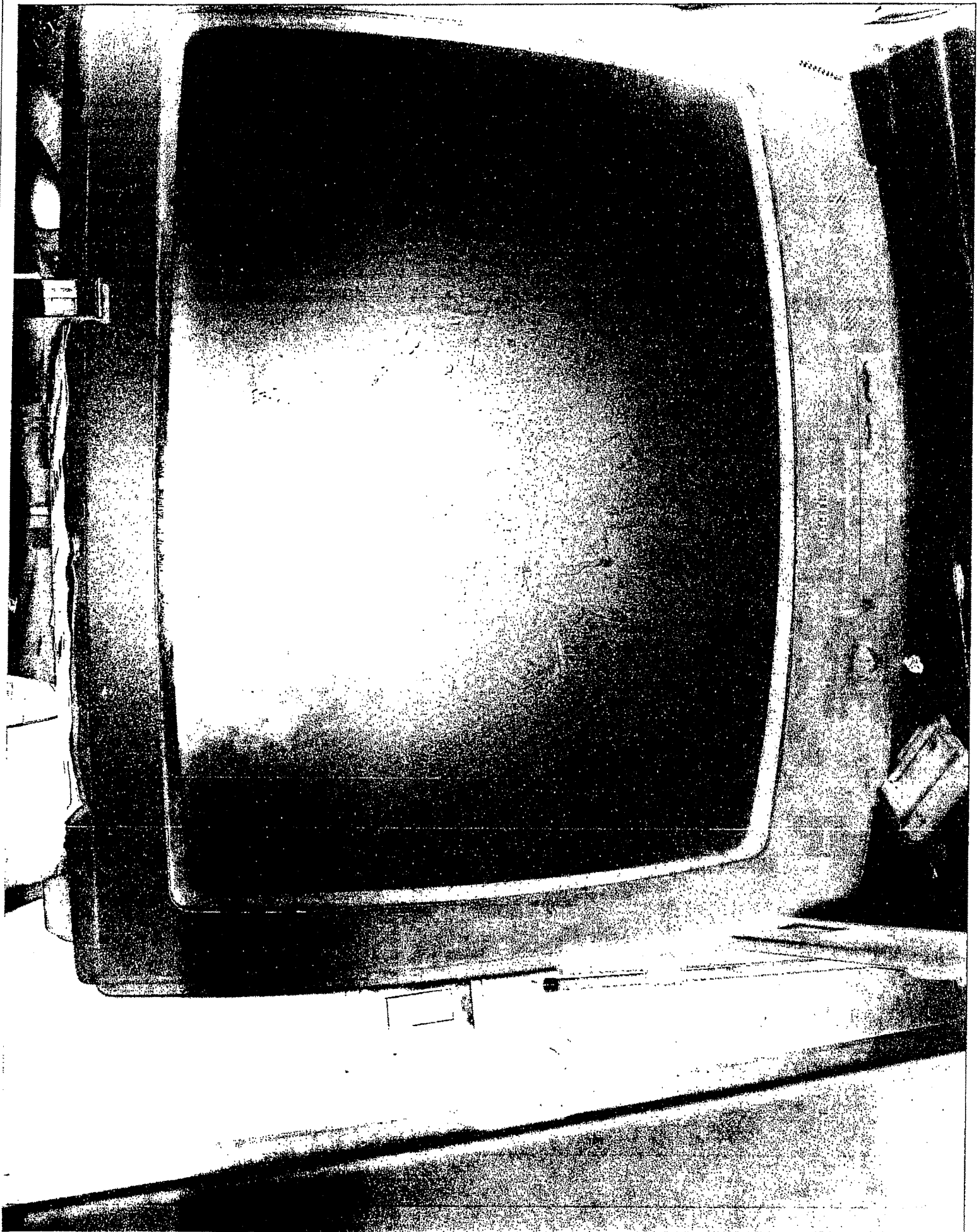
19Y600-7560

TV RECEIVER  
LISTED 347H

E10839







# ATTACHMENT 8



**From:** Robert Bonsignore rbonsignore@class-actions.us  
**Subject:** Re:  
**Date:** March 1, 2012 at 9:39 PM  
**To:** Mario N. Alioto malioto@tatp.com  
**Cc:** rbonsignore@classactions.us

This is the first I've been advised of the need for anything. No requests were ever sent to me. I think you are missing states such as New Hampshire.

Robert J. Bonsignore  
Trial Lawyer  
Bonsignore and Brewer  
193 Plummer Hill Road  
Belmont, NH 03220  
(781) 856 7650 (cell)  
Sent from my iPhone

On Mar 1, 2012, at 9:03 PM, "Mario N. Alioto" <malioto@tatp.com> wrote:

Attached is the chart summarizing the responses to the questionnaire sent out to class reps in August 2008 which I referred to in our call today.

Mario N. Alioto, Esq.  
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
2280 Union Street  
San Francisco, CA 94123  
Telephone: 415 447-1650  
Facsimile: 415 346-0679

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by e-mail and delete the message and any attachments.

<CRT--Analysis of Indirect Purchaser States & Class Reps.doc>

# **ATTACHMENT 9**



Robert Bonsignore <rbonsignore@class-actions.us>

---

## CRT screen

1 message

---

Deryl Edwards <deryled@swbell.net>

Tue, Dec 15, 2015 at 4:45 PM

To: rbonsignore@class-actions.us

Robert,

Attached are the pictures of the CRT screens. I took a picture of the front and back of each monitor. If you need any additional information, please advise.

Very truly yours,

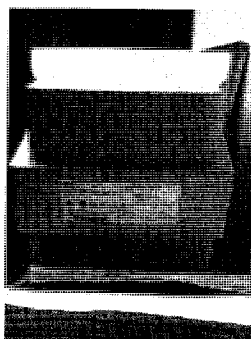
R. Deryl Edwards  
Attorney at Law  
606 South Pearl Ave.  
P.O. Box 760  
Joplin, Missouri 64802  
Tel: (417) 624-8099  
Fax: (417) 624-1965

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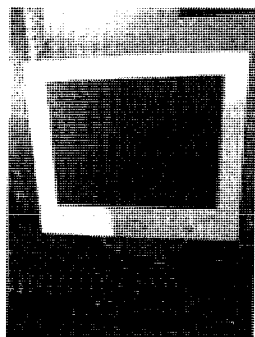
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---

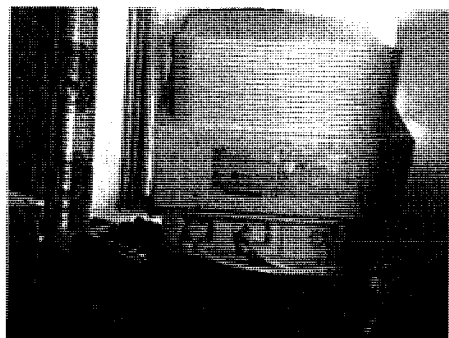
8 attachments



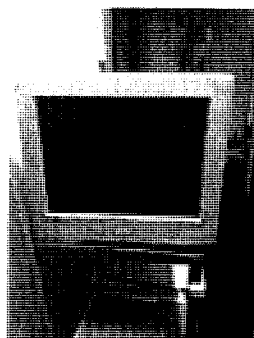
**KDS Avitron screen 1 CRT (back).jpg**  
1207K



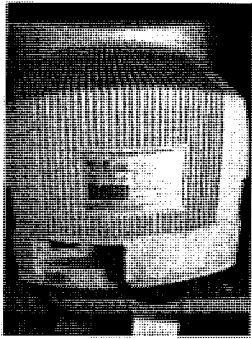
**KDS Avitron screen 1 CRT (front).jpg**  
1037K



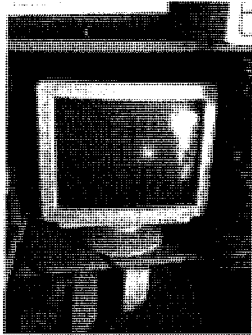
**KDS Avitron screen 2 CRT (back).jpg**  
1233K



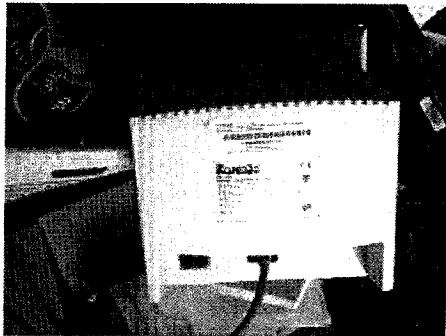
**KDS Avitron screen 2 CRT (front).jpg**  
891K



**KMD Plug and Play screen CRT (back) .jpg**  
1511K



**techmedia screen CRT (front) .jpg**  
939K

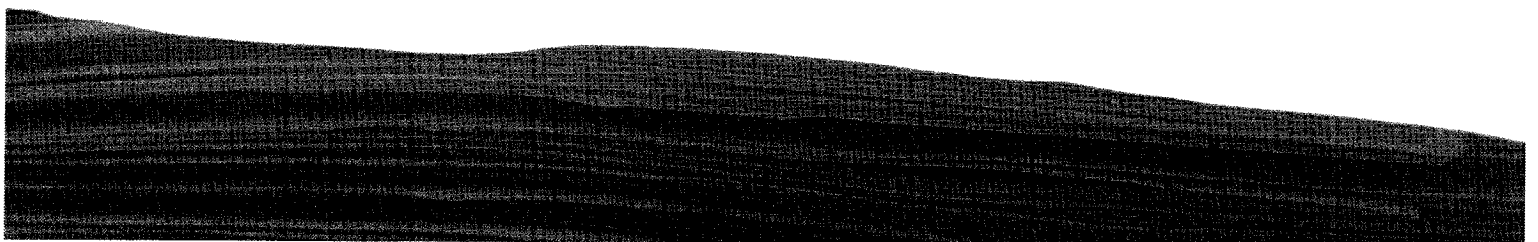


**techmedia screen CRT (back) .jpg**  
1212K

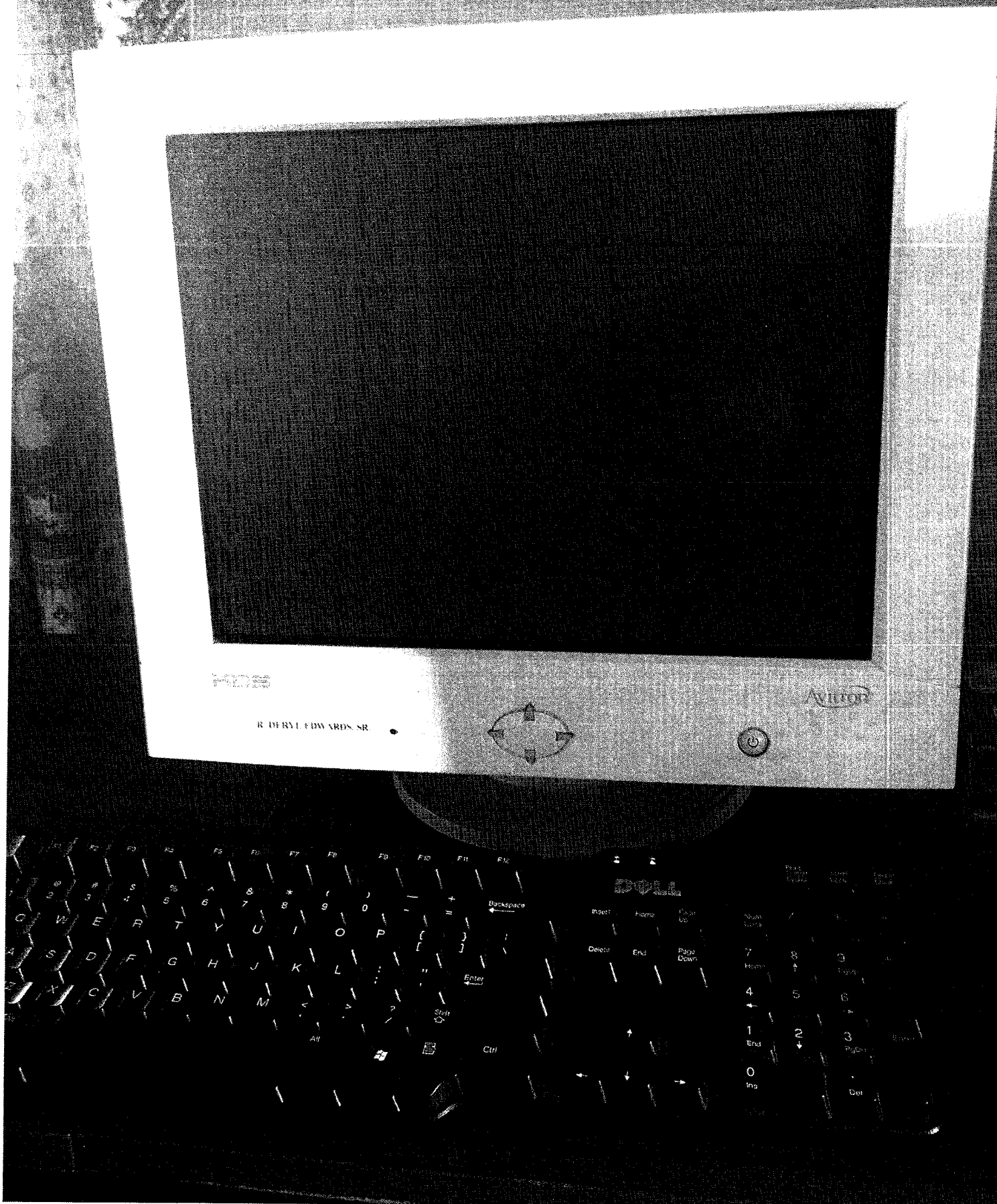


**KMD Plug and Play screen CRT (front) .jpg**  
1198K









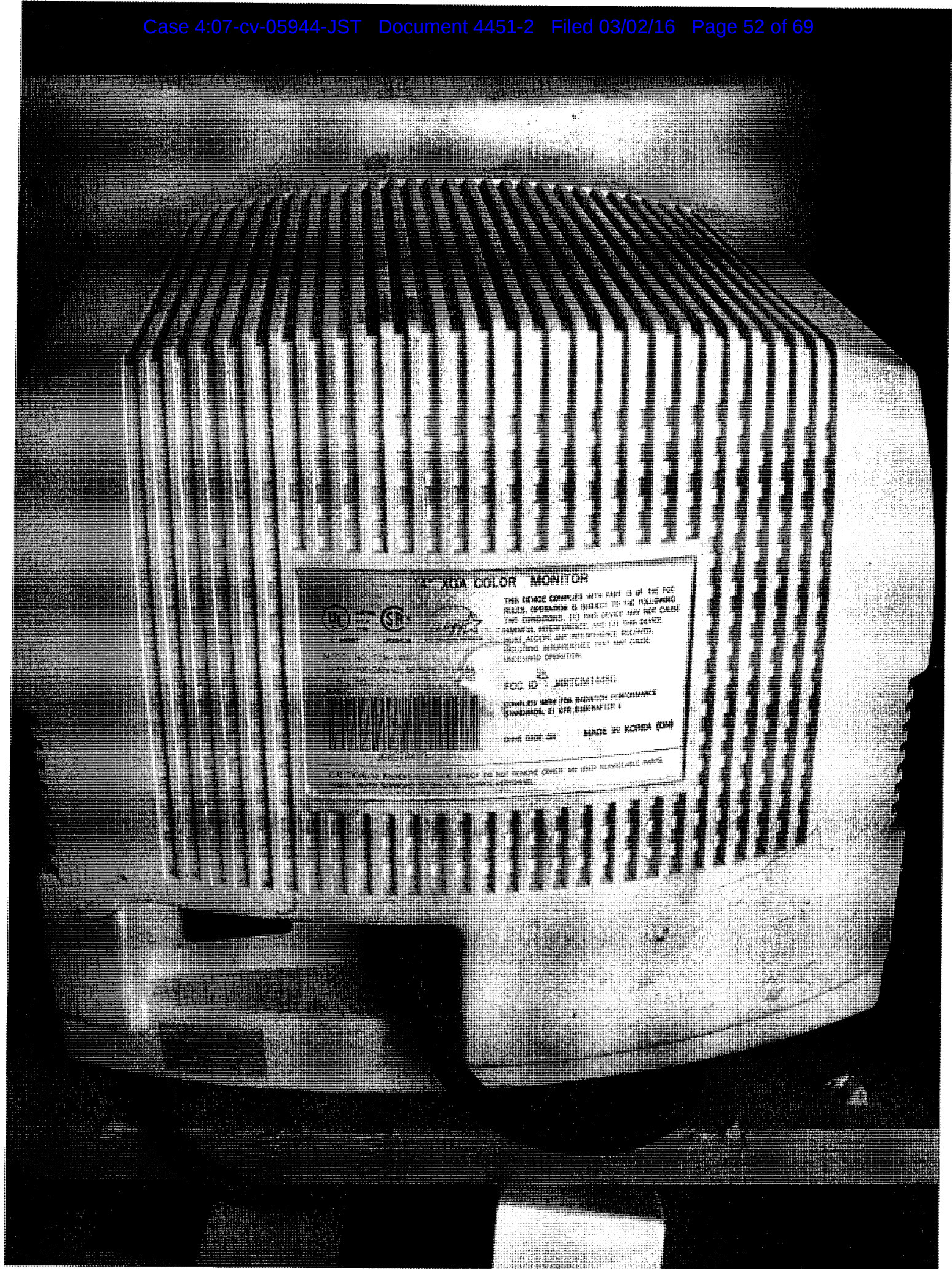


















Manufactured: June 30, 1997  
 THIS PRODUCT COMPLIES WITH DINHS RADIATION PERFORMANCE  
 STANDARDS, 21 CFR, SUBCHAPTER J



\*726WK002U01215\*

Sceptre Technologies, Inc.  
 18800 E. Gale, City of Industry, CA 91745, U.S.A.

**KOMODO®**

PN: H40  
 Ratings: 100-240VAC, 47-63Hz, 1.3A  
 This device complies with part 15 of the FCC Rules.  
 Operation is subject to the following two conditions:  
 (1) this device may not cause harmful interference, and  
 (2) this device must accept any interference received,  
 including interference that may cause undesired operation.  
 Canada ICES-003, Class B  
 Ce produit est conforme à la norme NTS-003  
 de la Commission des normes, de l'équité, de la  
 consommation et de la sécurité industrielle  
 (NCC) 1450



FCC ID: GXR450





# **ATTACHMENT 10a**





Robert Bonsignore <rbonsignore@class-actions.us>

---

## CRT - GIANASCA TV

1 message

---

**Robert Bonsignore** <rbonsignore@class-actions.us>

Mon, Nov 9, 2015 at 12:26 AM

To: Mario Alioto <malioto@tatp.com>

Bcc: rbonsignore@class-actions.us, fos@scarpullalaw.com

Robert J. Bonsignore  
Bonsignore Trial Lawyers, PLLC  
(781) 856 7650 cell

visit our new website at  
[www.classactions.us](http://www.classactions.us)

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Please consider the environment before you print this email.

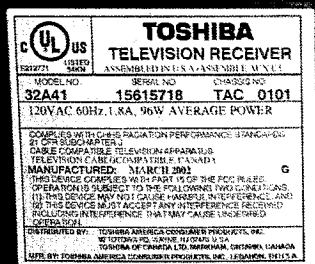
Begin forwarded message:

**From:** Anthony <agelectricalmechanical@gmail.com>

**Subject:** Crv

**Date:** November 3, 2015 at 5:43:22 PM EST


**To:** Robert Bonsignore <rbonsignore@classactions.us>



# **ATTACHMENT 10b**

# SHIELD

WARNING  
RISK OF ELECTRIC SHOCK  
DO NOT OPEN  
CAUTION: TO REMOVE COVER

	<b>TOSHIBA</b> <b>TELEVISION RECEIVER</b>	
	<small>ASSEMBLED IN U.S.A. ASSEMBLY: AINX 1.1</small>	
<small>LISTED 5212771</small>	<small>MODEL NO.</small> <b>32A41</b>	<small>SERIAL NO.</small> <b>15615718</b>
<small>SAFETY</small>	<small>CHASSIS NO.</small> <b>TAC 0101</b>	<small>POWER</small> <b>120V AC 60Hz 1.8A, 96W AVERAGE POWER</b>
<small>COMPLIES WITH DHB RADIATION PERFORMANCE STANDARDS          21 CFR SUBCHAPTER J          CABLE COMPATIBLE TELEVISION APPARATUS          TELEVISION CABLE COMPATIBLE CANADA</small>		
<small>MANUFACTURED: MARCH 2002</small>		
<small>THIS DEVICE COMPLIES WITH PART 15 OF THE FCC RULES          THIS DEVICE DOES NOT EXCEED THE FCC PART 15 LIMITS FOR          (1) THIS DEVICE MAY NOT CAUSE HARMFUL INTERFERENCE, AND          (2) THIS DEVICE MUST ACCEPT ANY INTERFERENCE RECEIVED,          INCLUDING INTERFERENCE THAT MAY CAUSE UNDESIRABLE          OPERATION.</small>		
<small>DISTRIBUTED BY: TOSHIBA AMERICA CONSUMER PRODUCTS, INC.          9740 TOWNE SQUARE, SUITE 100, FARMERS BRANCH, TEXAS 75448          TEL: 972/346-7000 FAX: 972/346-7001          MFR. BY: TOSHIBA AMERICA CONSUMER PRODUCTS, INC., LEHIGH, PA, U.S.A.</small>		

# **ATTACHMENT 10c**





# **ATTACHMENT 12**

## ATTACHMENT 3A



**From:** Robert Bonsignore rbonsignore@class-actions.us  
**Subject:** CRT TV  
**Date:** March 5, 2012 at 5:30 PM  
**To:** Carolyn Jorgensen cjorgensen@class-actions.us  
**Cc:** Alioto Mario malioto@tatp.com  
**Bcc:** Robert Bonsignore rbonsignore@class-actions.us

Ok do you remember where you bought it and how much you paid?  
Robert J. Bonsignore  
Trial Lawyer  
Bonsignore and Brewer  
193 Plummer Hill Road  
Belmont, New Hampshire 03220  
781 856 7650 CELL  
[rbonsignore@class-actions.us](mailto:rbonsignore@class-actions.us)

On Mar 2, 2012, at 1:33 PM, Carolyn Jorgensen wrote:

TV is a Sanyo

July 1995  
serial # V5290486805519

What a MONSTER! I do not believe I have the manual...

~ Carolyn

**Case Number:**

3:07-cv-05844-SG

**Filer:**

Indirect Purchaser Plaintiffs

I, CAROLYN DESELEAT ("CLIENT") retain the law firms of and Robert Bonsignore of BONSIGNORE & BREWER (hereinafter "ATTORNEYS"), to be my attorney in connection with the above-referenced action.

7. ATTORNEYS shall have the right to associate other attorneys at no additional expense to CLIENT.

DATED: 3/10/2012

[Signature]  
CLIENT SIGNATURE

75 Franklin St  
MAILING ADDRESS

Laconia N.H 03246  
CITY STATE ZIP

(603) 527-0009  
HOME TELEPHONE (Include Area Code)

(603) 630-0232  
WORK TELEPHONE (Include Area Code)

ACCEPTED BY ATTORNEYS:

BONSIGNORE & BREWER/

By: [Signature]

(2) 6

## ATTACHMENT 4

**From:** Robert Bonsignore <rbonsignore@class-actions.us>  
**Subject:** Fwd: David Perriman TV Purchase History  
**Date:** March 6, 2012 at 9:49 PM  
**To:** Mario Alioto <malioto@tatp.com>



Robert J. Bonsignore  
Trial Lawyer  
Bonsignore and Brewer  
193 Plummer Hill Road  
Belmont, NH 03220  
(781) 856 7650 (cell)  
Sent from my iPhone

Begin forwarded message:

**From:** Office <deryl@dedwardslaw.com>  
**Date:** March 6, 2012 9:44:26 PM EST  
**To:** Robert Bonsignore <rbonsignore@class-actions.us>  
**Subject:** Fwd: David Perriman TV Purchase History

Sent from my iPhone

Begin forwarded message:

**From:** <office@dedwardslaw.com>  
**Date:** March 6, 2012 6:21:14 PM CST  
**To:** "Karl Dickhaus" <karl@faxlaw.com>, "Office" <deryl@dedwardslaw.com>  
**Subject:** David Perriman TV Purchase History

David Perriman  
27300 Maple Road  
Carl Junction, MO 64834  
Telephone: 417-365-3652

Sarah Goolsby

Secretary for Deryl Edwards, Jr.

606 S. Pearl

Joplin, MO 64801

(417) 624-1962

Fax: (417) 624-1965

[deryl@dedwardslaw.com](mailto:deryl@dedwardslaw.com)



Perriman TV Purchase 3-  
6-2012.pdf